

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) No. 4:22-CR-00639-MTS (SRW)
)
RAY BRADLEY and)
MOREION LINDSEY,)
)
Defendants.)

GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Angie E. Danis and Nathan L. Chapman, Assistant United States Attorneys for said District, and makes the following additional disclosures pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure:

At trial, the Government intends to use evidence seized and statements made by the defendants during the events described below. This evidence and these statements are more fully set forth in investigative reports, which will be made available to the defendant. To the extent that any evidence outlined herein constitutes evidence of "Crimes or Other Acts" as contemplated by Federal Rule of Evidence 404(b), notice is hereby given that the Government intends, in the event of trial, to seek the admission of such evidence as probative of "motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident."

In connection with this filing, the Government moves for pretrial determination of admissibility of arguably suppressible statements made by the defendants. The listing of a potential witness or potential witnesses is not meant to be all-inclusive. As the date set for hearings approaches, the Government may add, substitute, or delete a witness or witnesses for various reasons.

The Government has not included in its listing of events the various physical surveillance that occurred or any photographs or videotapes taken during surveillance during the course of the investigation. Additionally, the Government has not listed any records obtained by subpoena. It is the Government's position that these events are not subject to suppression.

DATE	EVENT/ITEM	WITNESS
April 22, 2022	Pen Register/Trap-and-Trace/Precision Location Information for (518) 937-5874 (22-382) (Ray BRADLEY and Moreion LINDSEY)	TFO David Rudolph
April 26, 2022	Pen Register/Trap-and-Trace/Precision Location Information for (618) 795-7613 (22-392) (Jerome Williams)	TFO David Rudolph
April 27, 2022	Pen Register/Trap-and-Trace/Precision Location Information for (314) 528-0442 (22-397) (Moreion LINDSEY)	TFO David Rudolph
April 28, 2022	Search Warrant for GPS Data of 2015 Mazda CX5 VIN: JM3KE2CY8F0439759 (22-400) (Moreion LINDSEY)	TFO David Rudolph
April 28, 2022	Search Warrant for 2015 Mazda CX5 VIN: JM3KE2CY8F0439759 (22-401) (Moreion LINDSEY)	TFO David Rudolph
April 29, 2022	Search Warrant for 1511 Washington Avenue, Apartment 6A, St Louis, MO 63103 (4:22MJ8127SRW) (Jerome Williams)	TFO David Rudolph

April 29, 2022	Search Warrant for 2019 Dodge Ram VIN: 1C6SRFJT5KN506009 (4:22MJ8128SRW) (Jerome Williams)	TFO David Rudolph
May 2, 2022	Search Warrant Telematics System for 2019 Dodge Ram VIN: 1C6SRFJT5KN506009 (4:22MJ3118NCC) (Jerome Williams)	TFO David Rudolph
May 2, 2022	Pen Register/Trap-and-Trace/Precision Location Information for (253) 281-6618 (4:22MJ3119NCC) (Ray BRADLEY)	TFO David Rudolph
May 3, 2022	Search Warrant for 2161 Empire Court, Apartment J St Louis, MO 63103 (4:22MJ3125NCC) (Moreion LINDSEY)	TFO David Rudolph
May 3, 2022	Search Warrant for Apple Iphone Found on Jerome WILLIAMS' Person at Time of Arrest (4:22MJ3127NCC) (Jerome Williams)	TFO David Rudolph
May 4, 2022	Arrest and Custodial Interview of Moreion LINDSEY	TFO David Rudolph
May 10, 2022	Search Warrant for 1612 Lucas Avenue, Apartment 303 St. Louis, MO 63103 (4:22MJ121DDN) (Ray BRADLEY)	TFO David Rudolph
May 11, 2022	Search Warrant for 11845 Benham Road St. Louis, MO 63138 (4:22MJ136DDN) (Ray BRADLEY)	TFO David Rudolph
May 18, 2022	Search Warrant for 10834 Galt Industrial Business Park St. Louis, MO 63132 (4:22MJ7130SPM) (Ray BRADLEY)	TFO David Rudolph
May 19, 2022	Search Warrant for Information Associated with the Google Account raybradley619@gmail.com (4:22MJ7131SPM) (Ray BRADLEY)	TFO David Rudolph
May 20, 2022	Search Warrant for Facebook Account 100007472467778 (Victim's Account) (4:22MJ7135SPM)	TFO David Rudolph

May 20, 2022	Search Warrant for Facebook Account ray.bradley916 (4:22MJ7136SPM) (Ray BRADLEY)	TFO David Rudolph
May 27, 2022	Search Warrant for Target Devices 1 – 9 Seized from 1511 Washington Avenue, St. Louis, MO 63103 (4:22MJ148DDN) (Jerome Williams)	TFO David Rudolph
June 2, 2022	Search Warrant for Target Devices 1-13 seized from 1612 Lucas, Apartment 303 St. Louis, MO 63103 (4:22MJ1192JMB) (Ray BRADLEY)	TFO David Rudolph
August 4, 2022	Search Warrant for Facebook Account 1732177807 (Victim Account) (4:22MJ8208SRW)	TFO David Rudolph
October 6, 2022	Search Warrant for Information Associated with (347) 245-7871 and (347) 456-3930 (Victim Numbers) (4:22MJ8268SRW)	TFO David Rudolph
October 27, 2022	Search Warrant for Amazon Blink Account amirah_asadah@icloud.com (4:22MJ1331JMB) (Jerome Williams)	TFO David Rudolph
November 4, 2022	Search Warrant for Microsoft Live Account ray.bradley@live.com (4:22MJ5285NAB) (Ray BRADLEY)	TFO David Rudolph

In addition to the above-referenced evidence, the Government may seek to admit at trial various documentary and/or business records, including but not necessarily limited to records obtained from various providers of cellular telephone service. It is the Government's position that these records do not constitute "suppressible evidence," but inasmuch as the Court's order required disclosure of any "arguably suppressible evidence," the Government hereby gives notification of its intent to admit evidence in the form of such business records.

As additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose not to use some evidence described, or to use evidence additional to that listed in these reports. If the Government chooses to use additional

evidence, a supplemental Rule 12(b)(4) notice, and/or a Notice of Intent to Seek the Admission of Evidence Pursuant to Federal Rule of Criminal Procedure 404(b) will be filed.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Angie E. Danis

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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2022 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record for the defendants.

/s/ Angie E. Danis

ANGIE E. DANIS, #64805MO
Assistant United States Attorney